

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO 04-

HEIDI K. ERICKSON
Plaintiff

v.

FILED
U.S. DISTRICT COURT
MASSACHUSETTSMOTION FOR ORAL HEARING ON
2004 JUL 19 PRELIMINARY INJUNCTIONCOMMONWEALTH OF MASSACHUSETTS
MITT ROMNEY, ET AL
DefendantsU.S. DISTRICT COURT
DISTRICT OF MASS

1. The Plaintiff, Ms. Heidi K. Erickson, owner of several extremely valuable, to her emotionally, physically, intrinsically and irreplaceable companions, genetically unique and genetically valuable currently held by the Animal Rescue League, 599 Washington St. Pembroke, MA under a quarantine issued by the Defendant Massachusetts Department of Agricultural Resources under a pretextual sham quarantine for a common ailment, endemic in Ms. Erickson's beloved Persians and whereby it claims to prevent and deprive unconstitutionally and unlawfully Ms. Erickson's property.
2. A full hearing is required on a Preliminary Injunction as soon as possible upon a short notice as Ms. Erickson has witnesses to testify everything she asserts in her pleadings, each day her Persians suffer. Erickson points to photos attached to the Motion for TRO demonstrative of the inhumane and unnecessary suffering of her Persians – notice the photos before the ARL had taken care of them on 5/7/03 and the same cat after 11.5 months of that ARL neglect red swollen eyes, open soars indicative of putrid contaminated ambient air.
3. Defendants, refusing to release her property and maintaining them in abusive conditions, depriving them of adequate veterinary care and failing to provide emotional support to these gentle creature who by their nature and species require human touch and love.
4. Thus to avoid irreparable injury to the Plaintiff, and her property she requests that this Honorable Court hear this motion on short notice and upon oral argument supporting her requested relief in the filed herewith Motion for Preliminary Injunction supported by Memorandum of Law.

Respectfully submitted by:

Heidi K. Erickson, *pro se*July 19th, 2004